



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

JOSEPH M. HIRAOKA, JR.
Senior Counsel
jhiraoka@law.nyc.gov
Phone: (212) 356-2413
Fax: (212) 356-1148

January 17, 2023

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. Defendants write to respectfully request a two-week extension from January 18, 2023 to February 1, 2023 to respond to plaintiffs' letter to the Court filed on January 13, 2023 (Dkt. No. 814). This extension is necessary to confer with NYPD personnel and properly address the issues raised by plaintiffs in their application. This is defendants' first request for an extension of time to respond to plaintiffs' letter motion. Plaintiffs do not consent to this request, and only consent to a one-day extension to January 19, 2023.

The undersigned would also note that plaintiffs' instant motion is premature as they filed their motion on Friday, January 13, 2023 even though they gave defendants until Friday, January 13, 2023 to respond to plaintiffs.

Thank you for your consideration herein.

Respectfully submitted,

Joseph M. Hiraoka, Jr. s/

Joseph M. Hiraoka, Jr.

Senior Counsel

Special Federal Litigation Division

cc: ALL COUNSEL (*via* e-mail)